

REMARKS

This is a full and timely response to the outstanding final Office Action mailed April 22, 2002. Pending claims 1 – 32 stand rejected under 35 U.S.C. §102(e) as being anticipated by U.S. Patent No. 6,510,162 to *Fijolek et al.* (hereinafter *Fijolek*). Applicant traverses all the rejections and any official findings in the Office Action. Reconsideration and allowance of the present application and the presently pending claims are respectfully requested.

Response to Claim Rejections Under 35 U.S.C. §102(e)

In the Office Action, independent claims 1, 9, 10, 12, 18, and 21 as well as dependent claims 2 – 8, 11, 13 – 17, 19 – 20, 22 – 32 were rejected as being anticipated by *Fijolek*. Applicant respectfully disagrees with the interpretation of *Fijolek*.

Specifically, Applicant's independent claim 1 recites "establishing a **subnet connection**." (Emphasis added.) The Office Action specifies that col. 4, lines 40 – 57 and col. 5, line 43 – col. 6, line 12 of *Fijolek* contain a reference to "subnet connection[s]." However, at the most, these sections of *Fijolek* may mention "connections", but nothing in this portion of *Fijolek* mentions "**subnet** connection[s]" as recited in Applicant's independent claim 1. At several other places within claim 1, the words "Internet Protocol" and/or "IP" are used. One skilled in the art of IP technology will be aware that logical "subnet connections" are different from the physical connections described in col. 4, lines 40 – 57 and/or col. 5, line 43 – col. 6, line 12 of *Fijolek*. The Office Action cannot just ignore the adjective "subnet" in front of the noun "connection" as recited in independent claim 1. Therefore, the "subnet connection" in independent claim 1 is different from the physical connections described in col. 4, lines 40 – 57 and/or col. 5, line 43 –

col. 6, line 12 of *Fijolek*, such that independent claim 1 is allowable over *Fijolek*. Also, dependent claims 2 – 8, which depend from independent claim 1, are allowable over *Fijolek*.

Moreover, Applicant's independent claim 9 recites "establishing a **subnet connection**." (Emphasis added.) The Office Action specifies that col. 4, lines 40 – 57 and col. 5, line 43 – col. 6, line 12 of *Fijolek* contain a reference to "subnet connection[s]." However, at the most, these sections of *Fijolek* may mention "connections", but nothing in this portion of *Fijolek* mentions "**subnet** connection[s]" as recited in Applicant's independent claim 9. At several other places within claim 9, the words "Internet Protocol" and/or "IP" are used. One skilled in the art of IP technology will be aware that logical "subnet connections" are different from the physical connections described in col. 4, lines 40 – 57 and/or col. 5, line 43 – col. 6, line 12 of *Fijolek*. The Office Action cannot just ignore the adjective "subnet" in front of the noun "connection" as recited in independent claim 9. Therefore, the "subnet connection" in independent claim 9 is different from the physical connections described in col. 4, lines 40 – 57 and/or col. 5, line 43 – col. 6, line 12 of *Fijolek*, such that independent claim 9 is allowable over *Fijolek*.

Also, Applicant's independent claim 10 recites "establishing a **subnet connection**." (Emphasis added.) The Office Action specifies that col. 4, lines 40 – 57 and col. 5, line 43 – col. 6, line 12 of *Fijolek* contain a reference to "subnet connection[s]." However, at the most, these sections of *Fijolek* may mention "connections", but nothing in this portion of *Fijolek* mentions "**subnet** connection[s]" as recited in Applicant's independent claim 10. At several other places within claim 10, the words "Internet Protocol" and/or "IP" are used. One skilled in the art of IP technology will be aware that logical "subnet connections" are different from the physical connections described in col. 4, lines 40 – 57 and/or col. 5, line 43 – col. 6, line 12 of *Fijolek*. The Office Action cannot just ignore the adjective "subnet" in front of the noun "connection" as

recited in independent claim 10. Therefore, the “subnet connection” in independent claim 10 is different from the physical connections described in col. 4, lines 40 – 57 and/or col. 5, line 43 – col. 6, line 12 of *Fijolek*, such that independent claim 10 is allowable over *Fijolek*. Also, dependent claim 11, which depends from independent claim 10, is allowable over *Fijolek*.

In addition, Applicant’s independent claim 12 recites an “external **communications route**.” (Emphasis added.) The Office Action specifies that col. 4, lines 40 – 57 and col. 5, line 43 – col. 6, line 12 of *Fijolek* contain a reference to “communications route.” However, Applicant can find no reference to “route[s]” in these sections of *Fijolek*. At several other places within claim 12, the words “Internet Protocol” and/or “IP” are used. One skilled in the art of IP technology will be aware that “communications routes” in IP are a more refined concept from the “path” described in col. 4, line 41. The Office Action cannot just ignore this understanding of routes in Internet Protocol networks. Therefore, independent claim 12 is allowable over *Fijolek*. Also, dependents claim 13 – 17, which depend from independent claim 12, are allowable over *Fijolek*.

Furthermore, Applicant’s independent claim 18 recites “establishing a **subnet connection**.” (Emphasis added.) The Office Action specifies that col. 4, lines 40 – 57 and col. 5, line 43 – col. 6, line 12 of *Fijolek* contain a reference to “subnet connection[s].” However, at the most, these sections of *Fijolek* may mention “connections”, but nothing in this portion of *Fijolek* mentions “**subnet** connection[s]” as recited in Applicant’s independent claim 18. At several other places within claim 18, the words “Internet Protocol” and/or “IP” are used. One skilled in the art of IP technology will be aware that logical “subnet connections” are different from the physical connections described in col. 4, lines 40 – 57 and/or col. 5, line 43 – col. 6, line 12 of *Fijolek*. The Office Action cannot just ignore the adjective “subnet” in front of the noun

“connection” as recited in independent claim 18. Therefore, the “subnet connection” in independent claim 18 is different from the physical connections described in col. 4, lines 40 – 57 and/or col. 5, line 43 – col. 6, line 12 of *Fijolek*, such that independent claim 18 is allowable over *Fijolek*. Also, dependent claims 19 – 20, which depend from independent claim 18, are allowable over *Fijolek*.

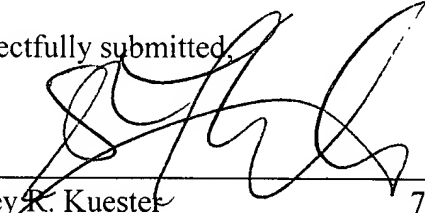
Likewise, Applicant’s independent claim 21 recites “establishing a ***subnet connection***.” (Emphasis added.) The Office Action specifies that col. 4, lines 40 – 57 and col. 5, line 43 – col. 6, line 12 of *Fijolek* contain a reference to “subnet connection[s].” However, at the most, these sections of *Fijolek* may mention “connections”, but nothing in this portion of *Fijolek* mentions “***subnet*** connection[s]” as recited in Applicant’s independent claim 21. At several other places within claim 21, the words “Internet Protocol” and/or “IP” are used. One skilled in the art of IP technology will be aware that logical “subnet connections” are different from the physical connections described in col. 4, lines 40 – 57 and/or col. 5, line 43 – col. 6, line 12 of *Fijolek*. The Office Action cannot just ignore the adjective “subnet” in front of the noun “connection” as recited in independent claim 21. Therefore, the “subnet connection” in independent claim 21 is different from the physical connections described in col. 4, lines 40 – 57 and/or col. 5, line 43 – col. 6, line 12 of *Fijolek*, such that independent claim 21 is allowable over *Fijolek*. Also, dependent claims 22 – 32, which depend from independent claim 21, are allowable over *Fijolek*.

Correspondingly, Applicant submits that all independent claims 1, 9, 10, 12, 18, and 21 as well as dependent claims 2 – 8, 11, 13 – 17, 19 – 21, and 22 – 32 are allowable over *Fijolek*.

CONCLUSION

In light of the foregoing amendments and for at least the reasons set forth above, Applicant respectfully submits that all objections and/or rejections have been traversed, rendered moot, and/or accommodated, and that the now pending claims 1 – 32 are in condition for allowance. Favorable reconsideration and allowance of the present application and all pending claims are hereby courteously requested. If, in the opinion of the Examiner, a telephonic conference would expedite the examination of this matter, the Examiner is invited to call the undersigned attorney at (770) 933-9500.

Respectfully submitted,



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